

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

U.S. DISTRICT COURT
CLERK

02 JAN 22 PM 3:49

FILED-EOS

CECIL R. TALIAFERRO,

Plaintiff,

v.

CITY COLLEGES OF CHICAGO,
ILLINOIS COMMUNITY COLLEGE
DISTRICT NO. 508,

Defendant.

Case No.

02C 0514

JUDGE HOLDERMAN

MAGISTRATE JUDGE ASHM
JURY TRIAL DEMANDED

DOCKETED

JAN 23 2002

COMPLAINT AT LAW

NOW COMES the Plaintiff, CECIL R. TALIAFERRO, by and through his attorneys, BARRY A. GOMBERG & ASSOCIATES, LTD., and complaining of the Defendant, CITY COLLEGES OF CHICAGO, ILLINOIS COMMUNITY COLLEGE DISTRICT NO. 508, states as follows:

COUNT I - TITLE VII

1. Plaintiff brings this cause pursuant to Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. § 2000e *et seq.* and the Civil Rights Act of 1991. Jurisdiction also arises pursuant to 28 U.S.C. § 1343(4).
2. Plaintiff has filed this cause subsequent to the timely filing of a Charge of Discrimination based on his sex (male); with the Illinois Department of Human Rights and the Equal Employment Opportunity Commission, a true and correct copy of which is attached hereto as Exhibit A.
3. Plaintiff has filed this cause pursuant to a Notice of Right to Sue issued by the United States Department of Justice within the statutory time requirements, a true and correct copy of which is attached hereto as Exhibit B.

4. Plaintiff, at all times pertinent hereto, was a person protected by the provisions of Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. § 2000e-5(b).

5. Defendant, at all times pertinent hereto, operated and did business within the jurisdiction of this judicial circuit and is an employer as defined by 42 U.S.C. § 2000e(b).

6. Plaintiff was employed by Defendant as Vice-President of Harold Washington College from February 14, 2000 until he was terminated September 29, 2000.

7. In direct violation of Title VII of the Civil Rights Act of 1964, as amended 42 U.S.C. § 2000e et seq., Defendant, by its agents and employees, engaged in the discriminatory acts described in the attached Charge of Discrimination, attached hereto as Exhibit A and incorporated herein by reference.

8. As a result of Defendant's discriminatory conduct as aforesaid, Plaintiff has suffered injury to his career as well as emotional pain, suffering, inconvenience, mental anguish and loss of enjoyment of life, and other non-pecuniary losses for which he is entitled to compensatory damages pursuant to 42 U.S.C. § 1981 a.

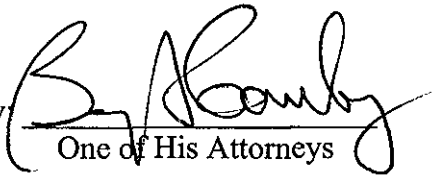
9. Defendant's discriminatory conduct as aforesaid, was done with malice and/or reckless indifference to Plaintiff's civil rights. Plaintiff is therefore entitled to punitive damages pursuant to 42 U.S.C. § 1981a

WHEREFORE, Plaintiff prays as follows:

- A. For an award of back pay, including lost wages, pension benefits, insurance benefits, accrued sick leave and other fringe benefits;
- B. For an award of compensatory damages for emotional pain, suffering, inconvenience, mental anguish and loss of enjoyment of life and other non-pecuniary damages;

- C. For front pay, with all pay, benefits and privileges he had before he was terminated, if the Court deems reinstatement instanter inappropriate;
- D. For an award of punitive damages in an amount to be determined at the time of trial;
- E. For attorney's fees and costs of this suit, including expert witness fees;
- F. For pre-judgment interest in an amount to be determined at the time of trial; and
- G. For such other relief as is just and equitable.

CECIL R. TALIAFERRO

By 
One of His Attorneys

Barry A. Gomberg
Brian S. Schwartz
BARRY A. GOMBERG & ASSOC., LTD.
53 W. Jackson Blvd., Suite 1350
Chicago, IL 60604
(312) 922-0550

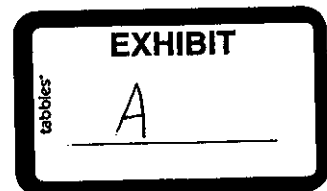
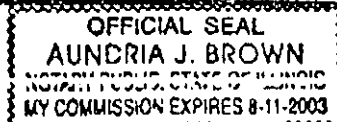
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From-ILL DEPT HUMAN RIGHTS

3128146251

T-617 P.002/003 F-782

ILLINOIS DEPARTMENT OF HUMAN RIGHTS & EOC (State or Local Agency, if any)		
NAME (Indicate Mr., Ms., or Mrs.) Cecil R. Taliaferro		HOME TELEPHONE NO. (Include Area Code) (773) 846-9290
STREET ADDRESS 6803 S. Wabash Street Unit B	CITY, STATE AND ZIP CODE Chicago, Illinois 60637	COUNTY Cook
NAMED IS THE EMPLOYER, LABOR ORGANIZATION, EMPLOYMENT AGENCY, APPRENTICESHIP COMMITTEE, STATE OR LOCAL GOVERNMENT AGENCY WHO DISCRIMINATED AGAINST ME (If more than one list below.)		
NAME <u>ILLINOIS COMMUNITY COLLEGE DISTRICT</u> <u>City Colleges of Chicago - Harold Washington College</u>	NO. OF EMPLOYEES/MEMBERS 15 +	TELEPHONE NUMBER (Include Area Code) (312) 553-5902
STREET ADDRESS 30 E. Lake Street	CITY, STATE AND ZIP CODE Chicago, Illinois 60601	
NAME	TELEPHONE NUMBER (Include Area Code)	
STREET ADDRESS	CITY, STATE AND ZIP CODE	
CAUSE OF DISCRIMINATION BASED ON (Check appropriate box(es)) <input type="checkbox"/> RACE <input type="checkbox"/> COLOR <input checked="" type="checkbox"/> SEX <input type="checkbox"/> RELIGION <input type="checkbox"/> NATIONAL ORIGIN <input type="checkbox"/> AGE <input type="checkbox"/> RETALIATION <input type="checkbox"/> OTHER (Specify) Disability		DATE MOST RECENT OR CONTINUING DISCRIMINATION TOOK PLACE (Month, day, year) 9-29-00
THE PARTICULARS ARE (If additional space is needed, attached extra sheet(s)): <i>Taliaferro / Agreement</i>		
I. I was hired as the Vice-President of Harold Washington College by Respondent on February 14, 2000. II. I was discharged by Respondent on September 29, 2000. III. I was discriminated against based on my sex (male) in that: A. Nancy DeSombre, President of Harold Washington College, subjected me to gender based hostility, discrimination and a hostile working environment. B. I was meeting the legitimate expectations of Respondent. C. Female employees were not subjected to gender based hostility, discrimination and a hostile working environment. D. The reasons given for my discharge were pretextual. IV. As a result of the aforementioned, I have suffered extreme emotional distress by		
<input checked="" type="checkbox"/> I also want this charge filed with the EEOC. I will advise the agencies if I change my address or telephone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.		NOTARY - (When necessary to meet State and Local Requirements) <i>Aundria J. Brown</i> I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief
I declare under penalty of perjury that the foregoing is true and correct. <i>X Cecil R. Taliaferro</i> Notary Stamp		SIGNATURE OF COMPLAINANT <i>X Cecil R. Taliaferro</i> SUBSCRIBED AND SWORN TO BEFORE ME THIS DATE (Day, month, and year) 4th DECEMBER 2000





U.S. Department of Justice

Civil Rights Division

NOTICE OF RIGHT TO SUE
WITHIN 90 DAYS

CERTIFIED MAIL
0921 7358

Employment Litigation Section
P.O. Box 65968
Washington, DC 20035-5968

November 13, 2001

Mr. Cecil R. Taliaferro
6803 S. Wabash St., Unit B
Chicago, IL 60637

Re: EEOC Charge Against City Colleges of Chicago, Illinois Community College
District #508, et al.
No. 21BA10661

Dear Mr. Taliaferro:

Because you filed the above charge with the Equal Employment Opportunity Commission, and more than 180 days have elapsed since the date the Commission assumed jurisdiction over the charge, and no suit based thereon has been filed by this Department, and because you have specifically requested this Notice, you are hereby notified that you have the right to institute a civil action under Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. 2000e, et seq., against the above-named respondent.

If you choose to commence a civil action, such suit must be filed in the appropriate Court within 90 days of your receipt of this Notice. If you cannot afford or are unable to retain an attorney to represent you, the Court may, at its discretion, assist you in obtaining an attorney. If you plan to ask the Court to help you find an attorney, you must make this request of the Court in the form and manner it requires. Your request to the Court should be made well before the end of the time period mentioned above. A request for representation does not relieve you of the obligation to file suit within this 90-day period.

This Notice should not be taken to mean that the Department of Justice has made a judgment as to whether or not your case is meritorious.

Sincerely,

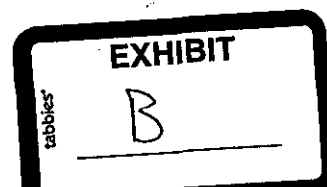
Ralph F. Boyd, Jr.
Assistant Attorney General
Civil Rights Division

by

A handwritten signature in cursive script, reading "Karen L. Ferguson", is written over the typed name.

Karen L. Ferguson
Civil Rights Analyst
Employment Litigation Section

cc: Chicago District Office, EEOC
City Colleges of Chicago, Illinois Community College District #508



Civil Cover Sheet

Page 1 of 2

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS**

Civil Cover Sheet

This automated JS-44 conforms generally to the manual JS-44 approved by the Judicial Conference of the United States in September 1974. The data is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. The information contained herein neither replaces nor supplements the filing and service of pleadings or other papers as required by law. This form is authorized for use only in the Northern District of Illinois.

Plaintiff(s): CECIL R. TALIAFERRO

**Defendant(s): CITY COLLEGES OF
CHICAGO, ILLINOIS COMMUNITY
COLLEGE DISTRICT NO. 508**

DOCKETED

County of Residence: Cook

County of Residence: Cook

JAN 23 2002

Plaintiff's Atty: Barry A. Gomberg/Brian S.
Schwartz
Barry A. Gomberg & Assoc.,
Ltd.
53 W. Jackson Blvd., Suite
1350
(312) 922-0550

Defendant's Atty:

02C 0514
JUDGE HOLDERMAN

MAGISTRATE JUDGE ASHMAN

II. Basis of Jurisdiction:

3. Federal Question (U.S. not a party)

III. Citizenship of Principle

Parties (Diversity Cases Only)

Plaintiff:- N/A

Defendant:- N/A

IV. Origin :

1. Original Proceeding

V. Nature of Suit:

442 Employment

VI. Cause of Action:

**Title VII of the Civil Rights Act of 1964, 42 U.S.C. sec. 2000e et
seq. Gender discrimination**

VII. Requested in Complaint

Class Action: No

Dollar Demand:

Jury Demand: Yes

VIII. This case IS NOT a refiling of a previously dismissed case.

Signature: _____

Date: _____

NOTE: When the print dialogue box appears, be sure to uncheck the Annotations option.

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS**

Eastern Division

In the Matter of

CECIL R. TALIAFERRO
Plaintiff,

v.

CITY COLLEGES OF CHICAGO, ILLINOIS COMMUNITY
COLLEGE DISTRICT NO. 508,
Defendant.

DOCKETED

JAN 23 2002

Case Number:

503-03713

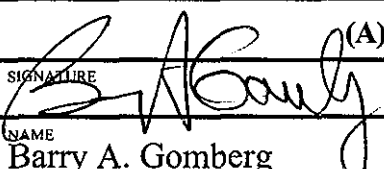
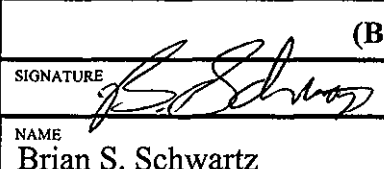

02C 0514

APPEARANCES ARE HEREBY FILED BY THE UNDERSIGNED AS ATTORNEY(S) FOR:

Plaintiff

JUDGE HOLDERMAN

MAGISTRATE JUDGE ASHMAN

(A)		(B)	
SIGNATURE 		SIGNATURE 	
NAME Barry A. Gomberg		NAME Brian S. Schwartz	
FIRM Barry A. Gomberg & Assoc., Ltd.		FIRM Barry A. Gomberg & Assoc., Ltd.	
STREET ADDRESS 53 West Jackson Blvd., Suite 1350		STREET ADDRESS 53 West Jackson Blvd., Suite 1350	
CITY/STATE/ZIP Chicago, IL 60604		CITY/STATE/ZIP Chicago, IL 60604	
TELEPHONE NUMBER (312) 922-0550		TELEPHONE NUMBER (312) 922-0550	
IDENTIFICATION NUMBER 		IDENTIFICATION NUMBER 6273020	
MEMBER OF TRIAL BAR? YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>		MEMBER OF TRIAL BAR? YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>	
TRIAL ATTORNEY? YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>		TRIAL ATTORNEY? YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>	
		DESIGNATED AS LOCAL COUNSEL? YES <input type="checkbox"/> NO <input type="checkbox"/>	
(C)		(D)	
SIGNATURE		SIGNATURE	
NAME		NAME	
FIRM		FIRM	
STREET ADDRESS		STREET ADDRESS	
CITY/STATE/ZIP		CITY/STATE/ZIP	
TELEPHONE NUMBER		TELEPHONE NUMBER	
IDENTIFICATION NUMBER		IDENTIFICATION NUMBER	
MEMBER OF TRIAL BAR? YES <input type="checkbox"/> NO <input type="checkbox"/>		MEMBER OF TRIAL BAR? YES <input type="checkbox"/> NO <input type="checkbox"/>	
TRIAL ATTORNEY? YES <input type="checkbox"/> NO <input type="checkbox"/>		TRIAL ATTORNEY? YES <input type="checkbox"/> NO <input type="checkbox"/>	
DESIGNATED AS LOCAL COUNSEL? YES <input type="checkbox"/> NO <input type="checkbox"/>		DESIGNATED AS LOCAL COUNSEL? YES <input type="checkbox"/> NO <input type="checkbox"/>	

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